

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RICARDO R. GARCIA, DUANE K. GLOVER, PAUL E. JACOBSON, GAETANO CALISE, MYKHAYLO I. HOLOVATYUK, BRIAN GARCIA, PAUL THOMSON and DAVID HARTMAN on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

VOLKSWAGEN GROUP OF AMERICA, INC. a/k/a AUDI OF AMERICA, INC., and VOLKSWAGEN A.G.

Defendants.

Case No.: 1:19-cv-00331-LO-MSN

**REPLY DECLARATION OF
MICHAEL J. MELKERSEN**

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Michael J. Melkersen, counsel to Plaintiffs in the above-styled action, under penalties of perjury, and in support of the Plaintiffs' Reply in Support of Motion to Compel Defendant Volkswagen Group of America, Inc.'s ("VWGOA's") Discovery Responses and Document Production, submits the following declaration:

1. I am a member in good standing of the Virginia State Bar and the Maryland State Bar. I am over the age of 18 years old. I have knowledge of the facts set forth in this Declaration, all of which are true and correct to the best of my knowledge and belief.

2. I am counsel of record for Plaintiffs and have been appointed Interim Class Counsel by the Court in this action.

3. Attached hereto as Exhibit Q is a true and correct copy of a discovery document produced by VWGOA and marked as VWVoA-Garcia-00450475-476, which is being filed under seal pursuant to the Stipulated Protective Order.

4. Attached hereto as Exhibit R is a true and correct copy of a discovery document produced by VWGOA and marked as VWVoA-Garcia-00045818--823, which is being filed under seal pursuant to the Stipulated Protective Order.

5. Attached hereto as Exhibit S is a true and correct copy of a discovery document produced by VWGOA and marked as VW-MDL2672-21293472, which is being filed under seal pursuant to the Stipulated Protective Order.

6. Attached hereto as Exhibit T is a true and correct copy of a discovery document produced by VWGOA and marked as VW-MDL2672-21293473, which is being filed under seal pursuant to the Stipulated Protective Order.

7. Attached hereto as Exhibit U is a true and correct copy of a discovery document produced by VWGOA and marked as VWVoA-Garcia-00044363-369, which is being filed under seal pursuant to the Stipulated Protective Order.

8. Attached hereto as Exhibit V is a true and correct copy of a discovery document produced by VWGOA and marked as VWVoA-Garcia-00244158-270, which is being filed under seal pursuant to the Stipulated Protective Order.

Respectfully submitted this the 25th day of February 2021.

/s/ Michael J. Melkersen
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CERTIFICATE OF SERVICE

I, Michael Melkersen, do hereby certify that I have this 25th day of February 2021 served a copy of this *Declaration* on the individuals below via electronic mail *ONLY* to the following addresses:

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